

EXHIBIT E

STATE OF MISSOURI
 DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

JUL - 2 2008

Mr. David M. Fraley
 Director – Environmental Affairs
 City Utilities of Springfield
 P.O. Box 551
 Springfield, MO 65801-0551

RE: New Source Review Permit Applicability Determination - Project Number: 2008-04-077
 Installation ID: 077-0039

Dear Mr. Fraley:

Your request for a determination of permit need for the modification to your turbine was reviewed by my staff. According to Missouri State Rule 10 CSR 10-6.061, *Construction Permit Exemptions*, **no construction permit is required** from the Missouri Air Pollution Control Program.

Your facility proposes to upgrade the existing HP/IP turbine rotor and inner casing, including other ancillary provisions to support the Dense Pack Turbine Project. The project includes the replacement of the existing unit (Westinghouse BB145P) with an enhanced model (Siemens-Westinghouse BB145PA). In conjunction with this project, Westinghouse has also redesigned the turbine blade and inlet geometry. The proposed modifications are expected to increase turbine performance without impacting the boiler steam flow. The result should be an increase in turbine output without increasing the output of the boiler or the annual emissions from the boiler.

A projected-actual-to-actual emissions test was performed to determine whether there is a significant emissions increase for this project. The results are given below in Table 1.

Table 1: Emissions Summary of the Project

Pollutants	*Actual Emissions from EIQs (tons per year)	Project Actual Emissions (tons per year)
PM ₁₀	218	218
SO _x	4233	4233
NO _x	2546	2546
VOC	23	23
CO	190	190
Lead	0.01	0.01
HAPs	31	31
Sulfuric Acid Mist	6.08	6.08

* Highest two (2) year average reported during the previous five (5) years.



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Since there should be no increase in emissions from this modifications, this project is exempted from a construction permit under Section 10 CSR 10-6.061(3)(B)2. The installation shall maintain all records (such as those outlined in 40 CFR 52.21) to support the findings of the actual-to-projected-actual applicability test. The installation shall maintain records of the baseline, projection and annual emissions information for five (5) years after the completion of the modifications.

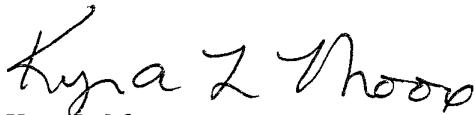
You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.045, *Open Burning Requirements*, 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.220, *Restriction of Emissions of Visible Air Contaminants*, and 10 CSR 10-4.070, *Restriction of Emission of Odors*.

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon request.

If you have any questions regarding this permit, please do not hesitate to contact Chai-Wei Young at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kyra L. Moore
Permits Section Chief

KLM:cwyk

c: Southwest Regional Office
PAMS File: 2008-04-077

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